

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO**

**In Re:**

**Paul Ralph Lucero**

**Debtor.**

**No. 19-12308-t13**

**DEBTOR'S MODIFICATION TO THE CHAPTER 13 PLAN**

**COMES NOW** the Debtor, by and through his attorney, Mark Regazzi, Esq., and modifies his Chapter 13 Plan as follows:

1. Debtor filed for protection under Chapter 13 on 10/08/2019.
2. Debtor is past due in his payments to the Chapter 13 Trustee.
3. The Debtor seeks to modify his plan so that his mortgage is paid ***through*** the plan instead of Direct.
4. The ongoing mortgage payments will begin with the April mortgage payment.
5. Debtor's plan payment will increase to \$3,500.00 beginning with the March 2022 Payment to account for the increase.
6. The pre-petition and post-petition arrearage on the mortgage will be paid by the Chapter 13 trustee.
7. Debtor further states that the post-petition arrearage incurred to the Ventana Ranch Community Association, Inc, Amended Proof of Claim #10, shall be paid through the plan by the Ch. 13 Trustee.
8. This modification will take effect immediately.
9. The distribution to Unsecured Creditors under this modification will not be in an amount less than such creditors would receive if the Debtor filed a Chapter 7.
10. The Debtor requests that any default incurred under Adequate Protection Orders due to missed payments be cured by this Modification.

Respectfully submitted,  
**s/electronically filed**  
Mark Regazzi, Esq.

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I hereby certify that a true copy of the foregoing was mailed, postage prepaid to the Office of the US Trustee (electronic notice), Tiffany M. Cornejo, Chapter 13 Trustee, and all parties in interest on **March 2, 2022**.

**s/electronically filed**  
Mark Regazzi, Esq.